

Safety Attribute Inspection (SAI) Data Collection Tool
4.4.4 Privileges and Limitations for Repairmen (AW)

ELEMENT SUMMARY INFORMATION

Purpose of This Element (Certificate Holder's responsibility):

- To ensure that certificated repairmen perform their assigned duties and responsibilities within the privileges and limitations of their certificate.

Objective (FAA oversight responsibility):

- To determine if the Certificate Holder's Privileges and Limitations for Repairmen process meets all applicable requirements of the Federal Aviation Regulations and FAA policies.
- To determine if the Certificate Holder's Privileges and Limitations for Repairmen process incorporates the System Safety Attributes.
- To identify any shortfalls in the Certificate Holder's Privileges and Limitations for Repairmen process.

SUPPLEMENTAL INFORMATION

Specific Regulatory Requirement(s) (SRRs):

- SRRs:
121.135(a)(1)
121.135(b)(1)
121.135(b)(2)
121.135(b)(3)
121.371(a)
121.378(a)
121.383(a)(1)
121.383(a)(3)
121.709(b)(3)
65.103
65.103(a)
65.103(b)
D084

Related CFR(s) & FAA Policy/Guidance:

- Related CFRs:
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- FAA Policy/Guidance:

SAI Template

Template Dated 10/23/03

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SAI SECTION 1 – PROCEDURES ATTRIBUTE

Objective: Procedures, instructions and information contained in Certificate Holder's manual are documented methods for accomplishing a process. Policies contained in the Certificate Holder's manual should establish the Certificate Holder's compliance posture. Policies may not be stand-alone statements but may be imbedded within procedures, instructions or information regarding a particular regulatory requirement. The questions in this section of the data collection tool are designed to assist the inspector in determining if the Certificate Holder's manual has documented or prescribed methods of accomplishing the process requirements that provide answers to the associated who, what, when, where and how type questions. This section of the data collection tool contains policy questions, procedural questions and instructional or informational questions pertaining to various types of Certificate Holder requirements such as actions, prohibitions or resources (i.e., personnel, facilities, equipment, technical data, etc.).

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Review the information listed in the Supplemental Information section of this data collection tool.
- 2 Review the duties and responsibilities for management and other personnel identified by the Certificate Holder who accomplish the Privileges and Limitations for Repairmen process.
- 3 Review the Certificate Holder's manual to ensure that it contains policies, procedures, instructions and information necessary for the Privileges and Limitations for Repairmen process.

Questions

To meet this objective, the inspector must answer the following questions:

1. Does the Certificate Holder's manual content meet the specific regulatory and FAA policy requirements for a Privileges and Limitations for Repairmen process:
 - 1.1 Does the Certificate Holder's manual contain general policies for the Privileges and Limitations for Repairmen process that comply with the specific regulatory requirements?
 SRRs: 121.135(b)(1); 121.371(a); 121.378(a); 121.383(a)(1); 121.383(a)(3); 121.709(b)(3); 65.103(a); 65.103(b)
 Related CFRs: Intentionally left blank

Related Design JTIs:
 - Check that the Certificate Holder manual system contains a policy to ensure that each repairman who is directly in charge of maintenance holds an appropriate airman certificate.
 Sources: 121.135(b)(1); 121.378(a)
 Interfaces: 1.1.1-aw; 1.3.1-aw; 1.3.7-aw; 4.2.1-aw
 - Check that the certificate holder's manual system contains a policy that ensures an authorized repairman sign the airworthiness release or make an aircraft log entry.
 Sources: 121.135(b)(1); 121.709(b)(3)
 Interfaces: 1.1.1-aw; 1.2.1-aw; 1.2.3-aw; 1.3.1-aw; 1.3.14-aw; 1.3.5-aw; 1.3.7-aw; 3.2.3-op; 4.2.1-aw; 5.1.8-aw; 5.1.8-op; 5.1.9-aw; 5.1.9-op
 - Check that the Certificate Holder's manual has a general policy that the Certificate Holder may not use any person as an airman nor may any person serve as an airman unless that person—Is

☐ Yes
☐ No, Explain

<p>otherwise qualified for the operation for which he is to be used. <i>Sources:</i> 121.135(b)(1); 121.383(a)(3) <i>Interfaces:</i> 1.3.14-aw; 1.3.7-aw; 4.4.2-aw</p> <ul style="list-style-type: none"> • Check that the certificate holder's manual system contains a policy that will ensure each person performing required inspections holds an appropriate airman certificate. <i>Sources:</i> 121.135(b)(1); 121.378(a) <i>Interfaces:</i> 1.1.1-aw; 1.2.3-aw; 1.3.1-aw; 1.3.14-aw; 1.3.2-aw; 2.1.1-aw; 2.1.1-op; 4.1.1-aw; 4.1.2-aw; 4.2.2-aw; 7.1.2-aw 	
<p>1.2 Does the Certificate Holder's manual cite the regulatory requirements listed in the Supplemental Information section of this SAI? <i>SRRs:</i> 121.135(b)(3)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.3 Does the Certificate Holder's manual contain the duties and responsibilities for personnel who will accomplish the Privileges and Limitations for Repairmen process? <i>SRRs:</i> 121.135(b)(2)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.4 Does the Certificate Holder's manual include instructions and information for personnel to meet the requirements of the Privileges and Limitations for Repairmen process? <i>SRRs:</i> 121.135(a)(1)</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> • Check that the Certificate Holder's manual include instructions and information necessary to allow personnel concerned to perform the duty and responsibility to determine that a certificated repairman may only perform or supervise the maintenance, alteration of aircraft or aircraft components appropriate to the job for which the repairman was employed and certificated. <i>Sources:</i> 65.103(a); 121.135(a)(1) <i>Interfaces:</i> All of 1.1; 1.2.1-aw; 1.2.2-aw; 1.2.3-aw; 1.3.1-aw; 1.3.2-aw; 1.3.9-aw; 4.2.1-aw; 4.2.6-op; 5.1.1-aw; 7.1.1-aw • Check that the Certificate Holder's manual include instructions and information necessary to allow personnel concerned to perform the duty and responsibility to determine that a certificated repairman may not perform or supervise duties under the repairman certificate unless the repairman understands the current instructions of the certificate holder and the manufacturer's instructions for continued airworthiness relating to the specific operations concerned. <i>Sources:</i> 65.103(b); 121.135(a)(1) <i>Interfaces:</i> 1.1.1-aw; 1.2.1-aw; 1.2.2-aw; 1.2.3-aw; 1.3.1-aw; 1.3.14-aw; 1.3.2-aw; 1.3.9-aw; 4.2.1-aw; 4.2.6-op; 5.1.1-aw; 7.1.1-aw; 7.1.2-aw • Check that the Certificate Holder's manual has instructions and information addressing duties and responsibilities for each person who is directly in charge of maintenance and ensuring they hold an appropriate airman certificate. <i>Sources:</i> 121.135(a)(1); 121.378(a) <i>Interfaces:</i> 1.1.1-aw; 1.3.1-aw; 1.3.7-aw; 4.2.1-aw • Check that the certificate holder's manual system has instructions and information on duties and responsibilities ensuring that each person 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

<p>performing required inspections holds an appropriate airman certificate. <i>Sources:</i> 121.135(a)(1); 121.378(a) <i>Interfaces:</i> 1.1.1-aw; 1.2.3-aw; 1.3.1-aw; 1.3.14-aw; 1.3.2-aw; 2.1.1-aw; 2.1.1-op; 4.1.1-aw; 4.1.2-aw; 4.2.2-aw; 7.1.2-aw</p> <ul style="list-style-type: none"> • Check that the certificate holder's manual system has instructions and information for the authorized certificated repairman to sign the airworthiness release or make an aircraft log entry. <i>Sources:</i> 121.135(a)(1); 121.709(b)(3) <i>Interfaces:</i> 1.1.1-aw; 1.2.1-aw; 1.2.4-aw; 1.3.1-aw; 1.3.14-aw; 1.3.5-aw; 1.3.7-aw; 3.2.3-op; 4.2.1-aw; 5.1.8-aw; 5.1.8-op; 5.1.9-aw; 5.1.9-op • Check that the certificate holder's manual has instructions and information for persons serving as an airman is otherwise qualified for the operation for which he is to be used. <i>Sources:</i> 121.135(a)(1); 121.383(a)(3) <i>Interfaces:</i> 1.3.14-aw; 1.3.7-aw; 4.4.2-aw 	
<p>1.5 Does the Certificate Holder's manual permit a repairman to be directly in charge of only those maintenance, preventive maintenance, or alterations which are appropriate to the job for which he/she was employed and certificated? SRRs: 65.103; 121.378(a)</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> • Check that the Certificate Holder's manual has instructions and information addressing duties and responsibilities for each person who is directly in charge of maintenance and ensuring they hold an appropriate airman certificate. <i>Sources:</i> 121.135(a)(1); 121.378(a) <i>Interfaces:</i> 1.1.1-aw; 1.3.1-aw; 1.3.7-aw; 4.2.1-aw 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.6 Does the Certificate Holder's manual require that an authorized repairman performing required inspections hold an airman certificate appropriate to the job for which he/she was employed and certificated? SRRs: 121.378(a); 65.103(a)</p> <p><i>Related Design JTIs:</i></p> <ul style="list-style-type: none"> • Check that the certificate holder's manual system has instructions and information on duties and responsibilities ensuring that each person performing required inspections holds an appropriate airman certificate. <i>Sources:</i> 121.135(a)(1); 121.378(a) <i>Interfaces:</i> 1.1.1-aw; 1.2.3-aw; 1.3.1-aw; 1.3.14-aw; 1.3.2-aw; 2.1.1-aw; 2.1.1-op; 4.1.1-aw; 4.1.2-aw; 4.2.2-aw; 7.1.2-aw 	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.7 Does the Certificate Holder's manual require that a repairman who performs duties under the repairman certificate understands the current instructions of the Certificate Holder and the manufacturer's continued airworthiness instructions relating to the specific operations concerned? SRRs: 121.383(a)(3); 65.103(b)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
<p>1.8 Does the Certificate Holder's manual require that a repairman who supervises duties under the repairman certificate understands the current</p>	<input type="checkbox"/> Yes

instructions of the Certificate Holder and the manufacturer's continued airworthiness instructions relating to the specific operations concerned? SRRs: 121.383(a)(3); 65.103(b)	<input type="checkbox"/> No, Explain
1.9 Does the Certificate Holder's manual require an authorized repairman to prepare an airworthiness release or make an appropriate entry in the aircraft log only for that work for which he/she is employed and certificated? SRRs: 121.709(b)(3)	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
1.10 If the Certificate Holder is authorized to conduct ferry flights using a special flight permit with continuous authorization, does the Certificate Holder's manual specify that an certificated repairman may certify only for the work for which he/she is employed? SRRs: D084	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain <input type="checkbox"/> Not Applicable

SAI SECTION 1 – PROCEDURES ATTRIBUTE –Drop Down Menu	
1. No procedures, policy, instructions or information specified.	
2. Procedures or instructions and information do not identify (who, what, when, where, how).	
3. Procedures, policy or instructions and information do not comply with CFR.	
4. Procedures, policy or instructions and information do not comply with FAA policy and guidance.	
5. Procedures, policy or instructions and information do not comply with other documentation (e.g., manufacturer's data, Jeppesen's Charts, etc.).	
6. Procedures, policy or instructions and information unclear or incomplete.	
7. Documentation quality (e.g., unreadable or illegible).	
8. Procedures, policy or instructions and information inconsistent across Certificate Holder manuals (FOM – Flight Operations Manual to GMM – General Maintenance Manual, etc.).	
9. Procedures, policy or instructions and information inconsistent across media (e.g., paper, microfiche, electronic).	
10. Resource requirements incomplete (personnel, facilities, equipment, technical data).	
11. Other.	

SAI SECTION 2 – CONTROLS ATTRIBUTE

Objective: Controls are checks and restraints designed into a process to ensure a desired result. The questions in this section of the data collection tool are designed to assist the inspector in determining if checks and restraints are designed into the process to ensure the desired result is achieved. Controls should be written into the manual system to ensure that the most important manual policies, procedures or instructions and information will be complied with.

Controls may be in the form of "administrative controls" which are secondary or supplemental written procedures. Like written procedures, administrative controls also need to provide answers to the associated who, what, when, where and how type questions. Controls may also be in the form of "engineered controls" such as automated features or mechanical actions or devices (i.e., safety devices, warning devices, etc.).

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Review the control questions below.
- 2 Review the Certificate Holder's policies, procedures, instructions and information to gain an understanding of the controls that it has documented.

Questions

To meet this objective, the inspector must answer the following questions:

2. Are the following controls built into the Privileges and Limitations for Repairmen process:
 - 2.1 Is there a control in place to ensure that repairman are employed and certificated for the maintenance, preventive maintenance, or alterations they perform?

☐ Yes
☐ No, Explain
 - 2.2 Is there a control in place to ensure the aircraft airworthiness releases, that were issued by authorized repairmen, were restricted to work for which the repairmen were employed and certificated?

☐ Yes
☐ No, Explain
 - 2.3 Is there a control in place to ensure that RII inspections that are accomplished by authorized certificated repairmen are restricted to work for which the repairmen are employed and certificated?

☐ Yes
☐ No, Explain
 - 2.4 Is there a control in place to ensure repairman entries in the aircraft log are restricted to work for which the repairmen are employed and certificated?

☐ Yes
☐ No, Explain
 - 2.5 Is there a control in place to ensure that certificated repairmen understand the current instructions of the Certificate Holder and the manufacturer's instructions for continued airworthiness relating to the specific operations concerned?

☐ Yes
☐ No, Explain
 - 2.6 Is there a control in place to ensure that maintenance, preventive maintenance, or alterations that are supervised by a certificated repairman are appropriate to the job for which he/she is employed and certificated?

☐ Yes
☐ No, Explain
 - 2.7 Is there a control in place to ensure that repairmen who supervise work functions understand the current instructions of the Certificate Holder and the manufacturer's instructions for continued airworthiness relating to the specific operations concerned?

☐ Yes
☐ No, Explain
 - 2.8 Is there a control in place to ensure when the Certificate Holder operates an aircraft under a special flight permit, the evaluation and inspection is accomplished by an appropriately certificated repairman?

☐ Yes
☐ No, Explain
☐ Not Applicable

2.9 Does the Certificate Holder have a documented method for assessing the impact of any changes made to the controls in the Privileges and Limitations for Repairmen process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
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SAI SECTION 2 – CONTROLS ATTRIBUTE –Drop Down Menu
1. No controls specified.
2. Documentation for the controls do not identify (who, what, when, where, how).
3. Controls incomplete.
4. Controls could be circumvented.
5. Controls could be unenforceable.
6. Resource requirements incomplete (personnel, facilities, equipment, technical data).
7. Other.

SAI SECTION 3 – PROCESS MEASUREMENT ATTRIBUTE

Objective: Process measurements are used by the Certificate Holder to measure and assess its processes to identify and correct problems or potential problems and to make improvements to the processes. The questions in this section of the data collection tool are designed to assist the inspector in determining if the Certificate Holder measures or assesses information to identify, analyze and document potential problems with the process. Process measurements are basically a Certificate Holder's internal evaluation or auditing of the most important policies, procedures or instructions and information associated with an element.

To prevent the duplication of work that would otherwise occur, Process Measurements are most commonly addressed through a combination of auditing features contained in both the Certificate Holder's Safety Program/Internal Evaluation Program (for Operations and Cabin Safety related issues) and the auditing function of the Continuous Analysis & Surveillance System (for Airworthiness or Maintenance/Inspection related issues). The Director of Safety and the Quality Assurance Department often work in conjunction to accomplish this function for the Certificate Holder. This approach simply requires amendment of the Safety Program/Internal Evaluation Program audit forms or checklists and the Continuous Analysis & Surveillance System audit forms or checklists to include the specific process measurements for each element.

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Review the process measurement questions below.
- 2 Review the Certificate Holder's policies, procedures, instructions and information to gain an understanding of the process measurements that it has documented.

Questions

To meet this objective, the inspector must answer the following questions:

3. Does the Certificate Holder's Privileges and Limitations for Repairmen process include the following process measurements:

3.1 Process measurements that would reveal when maintenance, preventive maintenance, or alterations were performed by other than repairmen employed and certificated for the work?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.2 Process measurements that would reveal aircraft airworthiness releases that were issued by other than authorized repairmen?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.3 Process measurements that would reveal any RII inspections that were accomplished by other than authorized repairmen?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.4 Process measurements that would reveal when repairman's entries in the aircraft log were for work other than that for which the repairman was employed and certificated?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.5 Process measurements to that would reveal a repairman's lack of understanding of either the current instructions of the Certificate Holder or the manufacturer's instructions?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.6 Process measurements that would reveal when maintenance, preventive maintenance, or alterations that were supervised by a certificated repairman were not appropriate to the job for which he/she was employed and certificated?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.7 Process measurements that would reveal when repairmen who supervised work functions failed to understand the current instructions of the Certificate Holder and the manufacturer's	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

instructions for continued airworthiness relating to the specific operations concerned?	
3.8 Process measurements that would reveal if the Certificate Holder operated an aircraft under a special flight permit, without accomplishing the evaluation and inspection with an appropriately certificated repairman?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.9 Does the Certificate Holder document its process measurement methods and results?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
3.10 Does the organization that conducts the process measurements have direct access to the person with responsibility for the Privileges and Limitations for Repairmen process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain

SAI SECTION 3 – PROCESS MEASUREMENT ATTRIBUTE –Drop Down Menu	
1. No process measurements specified.	
2. Documentation for the process measurements does not identify (who, what, when, where, how).	
3. Inability to identify negative findings.	
4. No provisions for implementing corrective actions.	
5. Ineffective follow-up to determine effectiveness of corrective actions.	
6. Resources requirements (personnel, facilities, equipment, technical data).	
7. Other.	

SAI SECTION 4 – INTERFACES ATTRIBUTE

Objective: Interfaces are used by the Certificate Holder to identify and manage the interactions between processes. The questions in this section of the data collection tool are designed to assist the inspector in determining whether or not interactions between the procedures, policies or instructions and information associated with other independent processes within the Certificate Holder's organization are documented. Written procedures, policies or instructions and information that are interrelated and located in different manuals within the Certificate Holder's manual system need to be consistent and complement each other. For the interfaces to be effectively managed, it is not only important to identify what the interfaces are, but it is imperative to document the specific location of the interfaces within the Certificate Holder's manual system.

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Review the interfaces associated with the Privileges and Limitations for Repairmen process that have been identified along with the individual questions in the Procedures Section (1) of this data collection tool.
- 2 Review the Certificate Holder's policies, procedures instructions and information to gain an understanding of the interfaces that it has documented.

Questions

To meet this objective, the inspector must answer the following questions:

NOTE: ALL EXPLANATIONS IN THE DROP DOWN MENU FOR "NO" ANSWERS MUST INCLUDE THE INDIVIDUAL QUESTION NUMBER FROM THE PROCEDURES SECTION (1) OF THIS DATA COLLECTION TOOL AND THE ELEMENT NUMBER(S) OF THE INTERFACE(S) THAT WERE NOT ADDRESSED.

4. Does the Certificate Holder's manual:

- | | |
|---|--|
| 4.1 Properly address the interfaces that are identified along with the individual questions in the Procedures Section (1)? | <input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain |
| 4.2 Document a method for assessing the impact of any changes to the associated interfaces within the Privileges and Limitations for Repairmen process? | <input type="checkbox"/> Yes
<input type="checkbox"/> No, Explain |
| 4.3 List additional interfaces identified during the accomplishment of this SAI. | |

SAI SECTION 4 – INTERFACES ATTRIBUTE –Drop Down Menu
1. No interfaces specified.
2. The following interfaces not identified within the Certificate Holder's manual system:
3. Interfaces listed are inaccurate.
4. Specific location of interfaces not identified within the manual system.
5. Other

SAI SECTION 5 – MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE

Objective: The questions in this section of the data collection tool address the responsibility and authority of the process. They are designed to assist the inspector in determining if there is a clearly identifiable, qualified and knowledgeable person who is responsible for the process, is answerable for the quality of the process and has the authority to establish and modify the process. (The person with the authority may or may not be the person with the responsibility.)

Tasks

To meet this objective, the inspector must accomplish the following tasks:

- 1 Identify the person who has overall responsibility for the Privileges and Limitations for Repairmen process.
- 2 Identify the person who has overall authority for the Privileges and Limitations for Repairmen process.
- 3 Review the duties and responsibilities of the person(s), documented in the Certificate Holder's manual.
- 4 Review the appropriate organizational chart.

Questions

To meet this objective, the inspector must answer the following questions:

5. Are the following aspects of the Management Responsibility and Authority Attributes addressed in the Privileges and Limitations for Repairmen process:
 - 5.1 Does the Certificate Holder's manual clearly identify who is responsible for the quality of the Privileges and Limitations for Repairmen process?

☐ Yes
☐ No, Explain Name/Title:
 - 5.2 Does the Certificate Holder's manual clearly identify who has authority to establish and modify the policies, procedures, instructions and information for the Privileges and Limitations for Repairmen process?

☐ Yes
☐ No, Explain Name/Title:
 - 5.3 Does the Certificate Holder's manual include the duties & responsibilities of those who manage the work required by the Privileges and Limitations for Repairman process?
SRRs: 121.135(b)(2)

☐ Yes
☐ No, Explain
 - 5.4 Does the Certificate Holder's manual include instructions and information for those who manage the work required by the Privileges and Limitations for Repairman process?
SRRs: 121.135(a)(1)

☐ Yes
☐ No, Explain
 - 5.5 Does the Certificate Holder's manual clearly and completely documented the authority for this position?

☐ Yes
☐ No, Explain
 - 5.6 Does the Certificate Holder's manual clearly and completely document their qualification standards for the person having responsibility for the Privileges and Limitations for Repairmen process?

☐ Yes
☐ No, Explain
 - 5.7 Does the Certificate Holder's manual clearly and completely document their qualification standards for the person having authority to establish and modify the Certificate Holder's policies, procedures, instructions and information for the Privileges and Limitations for Repairmen process?

☐ Yes
☐ No, Explain

5.8 Does the Certificate Holder's manual clearly and completely document the procedures for delegation of authority for the Privileges and Limitations for Repairmen process?	<input type="checkbox"/> Yes <input type="checkbox"/> No, Explain
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SAI SECTION 5 – MANAGEMENT RESPONSIBILITY & AUTHORITY ATTRIBUTE –Drop Down Menu
1. Not documented.
2. Documentation unclear.
3. Documentation incomplete.
4. Other.